

## REMARKS

Applicant respectfully requests reconsideration of this application in view of the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in substantially the same order in which the corresponding issues were raised in the Office Action.

### Status of the Claims

Claims 1-43 are pending. Claims 1, 13, 21, 24, 27, 29, 35, and 39 are currently amended. No claims are canceled. No claims are added. No new matter has been added.

### Summary of the Office Action

Claims 1-5, 7-9, 13-17, 19-30, 35-36, and 39-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,618,727 to Wheeler et al. (hereinafter "Wheeler") in view of U.S. Patent No. 6,718,324 to Edlund et al. (hereinafter "Edlund").

Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Wheeler in view of Edlund and in view of U.S. Patent No. 5,675,819 to Scheutze et al. (hereinafter "Schuetze").

Claims 11 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wheeler in view of Edlund and in view of U.S. Patent No. 5,983,216 to Kirsch et al. (hereinafter "Kirsch").

Claims 18, 33, 34, 38, and 43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wheeler in view of Edlund and in view of U.S. Patent No. 5,675,819 to Agrawal et al. (hereinafter "Agrawal").

Claims 31, 32, 37, and 42 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wheeler in view of Edlund and in view of U.S. Patent Application No. 2003/0084040 A1 to Jeffrey et al. (hereinafter "Jeffrey").

### Response to Rejections under 35 U.S.C. § 103(a)

The Office Action rejected claims 1-43 under 35 U.S.C. § 103(a) as being unpatentable over various combinations of Wheeler, Edlund, Scheutze, Kirsch, Agrawal, and/or Jeffrey. Applicant respectfully requests withdrawal of these rejections because the

combinations of cited references fail to teach or suggest all of the limitations of the claims.

#### CLAIMS 1-43

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Wheeler in view of Edlund. Applicant respectfully submits that claim 1 is patentable over the combination of cited references because the combination does not teach or suggest all of the limitations of the claim. Claim 1, as amended, recites:

A method, comprising:

generating a list of one or more related documents ranked based upon relevance to a first representation of content associated with a first field of a reference extensible markup language document, the first representation including a set of terms and one or more weighted values associated with each term in the set of terms; and

**generating a link to each of the one or more related documents, wherein the link points to a relevant field within each of the one or more related documents.**

(Emphasis added).

Applicant respectfully submits the cited combination of prior art fails to teach or suggest all of the limitations of the claim. In particular, Wheeler and Edlund, either alone or in combination, do not teach or suggest generating a link to each of the one or more related documents, wherein the link points to a relevant field within each of the one or more related documents. Additionally, the Office Action fails to provide a motivation to combine the references.

Wheeler is directed to detecting and scoring similarities between a search criteria and documents in a source database. Wheeler, Abstract. The Office Action asserts that col. 2, lines 21-26, of Wheeler teaches generating a link to each of the one or more related documents. Office Action, January 20, 2006, p. 3. However, Wheeler merely discloses creating a hierarchy of parent and child categories. Wheeler, col. 2, lines 20-23. The parent and child categories include objects identified as parent and child objects. Wheeler, col. 2, lines 13-17. In other words, the objects in the source database are arranged in parent and child categories, and each child category has a hierarchical relationship with the a corresponding parent category. Wheeler, col. 7, lines 11-15. The linking described in Wheeler is merely linking each child category with its parent

category. Wheeler, col. 2, lines 24-26. In this way, Wheeler merely teaches linking categories, but does not teach generating a link to a particular document. Moreover, Wheeler does not teach generating a link which points to a relevant field within each of the one or more related documents. Therefore, Wheeler does not teach generating a link as recited in the claim.

Edlund does not cure this lack of teaching by Wheeler. Edlund is directed to internet search engines and metadata search ranking. Edlund, Abstract. In regard to linking, Edlund merely describes linking web pages, generally. Edlund, col. 1, lines 59-64. The web pages are implemented with hyper-text markup language (HTML) protocol and not with extensible markup language (XML) protocol. Edlund, col. 1, lines 44-45. Thus, even though Edlund teaches linking HTML web pages, Edlund does not teach or suggest generating a link to one or more documents related to a representation of content associated with a field of a reference XML document. Furthermore, Edlund does not teach or suggest generating a link which points to a relevant field within each of the one or more related documents.

In contrast, claim 1 recites “generating a link to each of the one or more related documents, wherein the link points to a relevant field within each of the one or more related documents.” For the reasons stated above, Wheeler and Edlund, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest generating a link to each of the one or more related documents, wherein the link points to a relevant field within each of the one or more related documents.

Moreover, even if the combination of cited references were to disclose all of the limitations of the claim, the Office Action does not provide a proper motivation to combine the references. Specifically, the Office Action merely restates the advantage of Edlund alone, which is not readily applicable to Wheeler because Wheeler does not deal with changes in Web content. The relevance measure of Edlund accounts for the change in Web content, but the Office Action fails to describe how finding changes in Web content might be applicable to searching objects in a database. In particular, Wheeler does not describe searching the database for changes in content, but rather for finding documents according to the search query. There is no mention of even the possibility of

changing content, and even if there were changing content in the database, Wheeler does not describe finding such changes. In contrast, Edlund apparently is directed to finding changes in content. Therefore, although the Office Action generally asserts that the teaching of Edlund would have allowed Wheeler to “improve the quality of results returned to users,” this generic assertion of improved performance is not supported by the differences between the searching applications of Wheeler and Edlund.

Given that the cited references fail to teach or suggest all of the limitations of the claim, Applicant respectfully submits that claim 1 is patentable over the cited references. Moreover, the claim is patentable over the cited references because there is the Office Action fails to establish a motivation to combine the references. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

Given that claims 2-12 depend from independent claim 1, which is patentable over the cited references, Applicant respectfully submits that dependent claims 2-12 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 2-12 under 35 U.S.C. § 103(a) be withdrawn.

Each of independent claims 13, 21, 24, 27, 29, 35, and 39 includes a limitation which is similar to the limitation of claim 1. Given that the cited references fail to disclose at least the described limitations, and the Office Action fails to establish a motivation to combine the references, Applicant respectfully submits that independent claims 13, 21, 24, 27, 29, 35, and 39 are each patentable over the cited references. Furthermore, each of independent claims 13, 21, 24, 27, 29, 35, and 39 may be patentable over the cited references for additional reasons. Accordingly, Applicant requests that the rejections of claims 13, 21, 24, 27, 29, 35, and 39 under 35 U.S.C. § 103(a) be withdrawn. Additionally, Applicant respectfully requests that the rejection of dependent claims 14-20, 22-23, 25-26, 28, 30-34, and 40-43 under 35 U.S.C. § 103(a) also be withdrawn for depending from allowable independent claims 13, 21, 24, 27, 29, 35, and 39.

### CONCLUSION

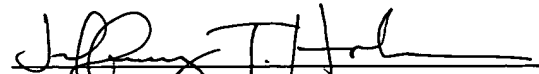
It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections have been overcome. If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Jeffrey Holman at (408) 720-8300.

If there are any additional charges, please charge them to Deposit Account No. 02-2666.

Respectfully submitted,

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